

1 **Thomas P. Riley, SBN 194706**
2 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
3 **First Library Square**
4 **1114 Fremont Avenue**
5 **South Pasadena, CA 91030-3227**

6 **Tel: 626-799-9797**
7 **Fax: 626-799-9795**
8 **TPRLAW@att.net**

9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **J & J Sports Productions, Inc.,**

14 **Plaintiff,**

15 **vs.**

16 **Jose O. Lopez,**

17 **Defendant.**

CASE NO. 3:14-cv-05131-HSG

**STIPULATION OF DISMISSAL OF
PLAINTIFF'S COMPLAINT AGAINST
DEFENDANT JOSE O. LOPEZ, individually
and d/b/a LOPEZ APPLIANCES**

18 **IT IS HEREBY STIPULATED** by and between Plaintiff J & J SPORTS PRODUCTIONS,
19 INC. and Defendant JOSE O. LOPEZ, individually and d/b/a LOPEZ APPLIANCES, that the above-
20 entitled action is hereby dismissed **without prejudice** against JOSE O. LOPEZ, individually and d/b/a
21 LOPEZ APPLIANCES and subject to the Court's jurisdiction to enforce the settlement agreement
22 reached between the Parties.

23 **IT IS FURTHER STIPULATED** that provided no Party referenced above has filed a
24 motion to reopen this action by September 7, 2015, the dismissal shall be deemed to be **with**
25 **prejudice.**

26 ///

27 ///

28 ///

///

///

1 This dismissal is made pursuant to Federal Rules of Civil Procedure 41(a)(1). Each Party
2 referenced-above shall bear its own attorneys' fees and costs.

3
4
5
6 Dated:

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

J & J SPORTS PRODUCTIONS, INC.

7
8
9
10
11
12
13 Dated:

AXCEL LAW PARTNERS, LLP

By: Craig C. Daniels

Attorneys for Defendant

JOSE O. LOPEZ, individually and d/b/a LOPEZ
APPLIANCES

14
15
16
17
18
19
20
21
22
23 **IT IS SO ORDERED:**

24
25
26 
The Honorable Haywood S. Gilliam, Jr.

27 United States District Court

28 Northern District of California

Dated: August 28, 2015

PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is First Library Square, 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On August 4, 2015, I caused to serve the following documents entitled:

**STIPULATION OF DISMISSAL OF PLAINTIFF'S COMPLAINT AGAINST
DEFENDANT JOSE O. LOPEZ, individually and d/b/a LOPEZ APPLIANCES**

On all parties referenced by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was addressed to:

Mr. Craig C. Daniel, Esq. (Attorneys for Defendant)
Mr. Jayson Singh Sohi, Esq. (Attorneys for Defendant)
AXCEL LAW PARTNERS, LLP
4 Embarcadero Center, 14th Floor
San Francisco, CA 94111

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct and that this declaration was executed on August 28, 2015, at South Pasadena, California.

Dated: August 4, 2015

VANESSA VENTURA